

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

POLAROID CORPORATION,)
Plaintiff,) C. A. No. 06-738 (SLR) (D.Del.)
v.)
HEWLETT-PACKARD COMPANY,)
Defendant.)

)

REDACTED

DECLARATION OF TEODORO HAASL-MARTINEZ

1. I am employed by Hewlett-Packard Company ("HP") as a software engineer and technical project manager in the research and development area. I currently work in HP's Vancouver office. I report to Juli Lee. I have been employed by HP for seventeen years. I have a degree in Information Technology. My work ordinarily involves projects relating to release of new products. I am familiar with the algorithm known as Local Area Contrast Enhancement ("LACE") from my work on HP printer drivers.

2. As explained below, I and others at HP have spent a significant amount of time making our best effort to reply accurately and fully to discovery requests by Polaroid in this action.

3. Much of my work at HP involves printer drivers. A printer driver is the software code by which the computer directs the printer what to do.

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6. My involvement in the current lawsuit by Polaroid against HP began in January 2007.

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My deposition was taken on February 1, 2008, and as noted I have performed substantial additional work in response to questions that Polaroid raised thereafter. If it is deemed necessary to have another deposition concerning my work after February 1, 2008, I am willing to appear for another deposition. Likewise, if called as a witness, I am prepared to testify at trial.

Signed under the pains and penalties of perjury this 14 day of June, 2008.


Teodoro Haasl-Martinez

CERTIFICATE OF SERVICE

I hereby certify that on June 12, 2008, I electronically filed with the Clerk of Court the foregoing document using CM/ECF which will send electronic notification of such filing(s) to the following counsel:

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/s/ Raymond N. Scott, Jr.

Raymond N. Scott, Jr.

Exhibit A

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IN ITS ENTIRETY**